

Kevin H. Sharp

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	NO. 3:11-CR-00012-6
v.	)	
	)	JUDGE SHARP
SHATIKA DIX	)	

**MOTION TO STRIKE NOTICE**

Defendant, through counsel, moves this Court to allow defendant to strike her Notice of intent to change plea (Docket No. 1404). In support, defendant would show:

1. Defendant was initially charged by complaint on December 09, 2010 and indicted on January 12, 2011, charged in one count. Defendant is indigent, and undersigned counsel has been appointed by this Court to represent her (Docket Nos. 2, 81-83,202). Defendant is the single mother of two small children and has never been convicted of a crime.

2. On April 17, 2013 defendant filed a notice informing the Court that she intended to change her plea and enter a plea of guilty to the indictment filed on January 12, 2011 (Docket No. 1404). Defendant had no agreement with the government and intended to plead open to the only count against her. Defendant is safety valve eligible, working, and raising her children. She has had no problems on pre-trial release since her indictment in 2011.

3. With notice of defendant's intent to change her plea the government sought and obtained a superseding indictment that charges her with two additional counts. Defendant is now charged with three crimes, instead of one, for the exact conduct.